

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION**

**FEDERAL INSURANCE COMPANY,  
PACIFIC EMPLOYERS INSURANCE  
COMPANY, ACE AMERICAN  
INSURANCE COMPANY, ACE  
PROPERTY AND CASUALTY  
INSURANCE COMPANY, INDEMNITY  
INSURANCE COMPANY OF NORTH  
AMERICA, AND WESTCHESTER FIRE  
INSURANCE COMPANY**

**Plaintiff,**

**v.**

**SHAW INDUSTRIES, INC.**

**Defendant,**

**AND**

**COMMERCE & INDUSTRY INSURANCE  
COMPANY; FIRST STATE INSURANCE  
COMPANY; EMPLOYERS INSURANCE  
COMPANY IF WAUSAU; GREAT  
AMERICAN INSURANCE COMPANY;  
U.S. FIRE INSURANCE COMPANY;  
TREAVELERS CASUALTY AND  
SURETY COMPANY; JOHN DOE  
INSURERS 1- 100;**

**NOMINAL DEFENDANTS**

**Civil Action No.: 1:23-cv-01367-RDP**

**APPLICATION FOR ADMISSION *PRO HAC VICE*  
BY JAY R. SEVER FOR DEFENDANT EMPLOYERS INSURANCE  
COMPANY OF WAUSAU**

STATE OF LOUISIANA)  
COUNTY OF ORLEANS)

I, Jay R. Sever, being over eighteen (18) years of age and duly sworn according to law and pursuant to Local Rule 83.1 of this Court, depose and state as follows:

1. I reside at 1350 Camp Street, New Orleans, Louisiana 70130.

2. I practice law with the following law firm:

Phelps Dunbar LLP  
365 Canal Street, Ste. 2000  
New Orleans, LA 70130-6534  
Telephone: 504.566.1311  
Fax: 504.568.9130  
E-Mail: jay.sever@phelps.com

3. I was admitted to the Louisiana State Bar in 1995, California State Courts in 1993, United States District Court Central District of California in 1993, United States District Court Eastern District of California in 1993, United States District Court Southern District of California in 1994, United States District Court Northern District of California in 1994, United States District Court Eastern District of Louisiana in 1994, United States District Court Western District of Louisiana in 1995, United States District Court Middle District of Louisiana in 1995, United States District Court Western District of Tennessee in 2010, Louisiana State Courts in 1995, United States Supreme Court in 1995, United States Court of Appeals, 4<sup>th</sup> Circuit in 2012, United States Court of Appeals, 5<sup>th</sup> Circuit in 1995, United States Court of Appeals, 6<sup>th</sup> Circuit in 2014, United States

Court of Appeals, 9<sup>th</sup> Circuit in 1994, United States Court of Appeals, 10<sup>th</sup> Circuit in 2014 and the United States Court of Appeals, 11<sup>th</sup> Circuit in 2002. I reside in the Orleans County of Louisiana and regularly practice law in that District Court.

4. I am a member in good standing of and am eligible to practice law in all of the above-referenced Courts.

5. I have been retained to represent Employers Insurance Company of Wausau, the defendant in the above-styled action. Alabama local counsel for the Defendant in this action is designated as follows:

Kenneth Boyles  
Phelps Dunbar LLP  
2001 Park Place North, Suite 700  
Birmingham, Alabama 35203  
Telephone: (205) 716-5200  
Facsimile: (205) 716-5389  
Email: Kenneth.boyles@phelps.com

Local counsel's written consent to designation in this action is attached hereto as Exhibit A.

6. I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

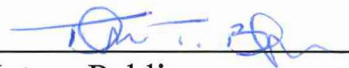
Dated this the 1<sup>st</sup> day of April 2024.



---

Jay R. Sever

SUBSCRIBED AND SWORN TO before me this 1<sup>st</sup> day of April 2024 by  
Jay R. Sever, who is known to me.



---

Notary Public

My commission expires:

at death

**Tucker T. Bohren**  
**Notary Public**  
**Bar No. 37039**  
**Parish of Orleans, State of Louisiana**  
**My Commission is Issued for Life.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I caused a true and accurate copy of the foregoing **APPLICATION FOR ADMISSION *PRO HAC VICE* BY JAY R. SEVER FOR DEFENDANT** to be electronically filed with the Clerk of Court for the United States District Court for the Northern District of Alabama using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

This the 1<sup>st</sup> day of April 2024.

/s/ *Kenneth W. Boyles, Jr.*

**Kenneth W. Boyles, Jr.**

**United States of America**

**State of Louisiana**

**Supreme Court of the State of Louisiana**

---

---

**I, VERONICA ODINET KOCLANES, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that**

***JAY RUSSELL SEVER ESQ., #23935***

**was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 6th Day of October, 1995 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.**

**IN WITNESS WHEREOF, I hereunto sign  
my name and affix the seal of this Court, at  
the City of New Orleans, this the 8th Day of  
March, 2024, A.D.**



**Clerk of Court  
Supreme Court of Louisiana**